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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAMES ROOT, an individual;

Plaintiff;

v.

AMERICAN EXPRESS NATIONAL BANK; a
national banking association; EXPERIAN
INFORMATION SOLUTIONS, INC., a foreign
corporation; TRANS UNION LLC, a foreign
limited-liability company;

Defendants.

Case No.: 2:20-cv-02267-RFB-NJK

**STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF
TO FILE A RESPONSE TO
DEFENDANT AMERICAN EXPRESS
NATIONAL BANK'S MOTION TO
STAY DISCOVERY [ECF NO. 32]**

[First Request]

Under LR IA 6-1, Plaintiff, James Root ("Plaintiff"), and Defendant, American Express National Bank ("Amex") have agreed to extend the time for Plaintiff to file a Response to Amex's Motion to Stay Discovery Pending a Ruling on its Motion to Compel Arbitration and Stay Action [ECF No. 32] ("Motion to Stay") through **June 8, 2021**. Amex filed its Motion to Stay on May 18, 2021, and the current response deadline is June 1, 2021.

The parties request this brief one-week extension to permit Plaintiff additional time to research relevant case law and prepare the necessary briefing to adequately respond to Amex's Motion to Stay. The Parties agree Amex will also have an additional week to file its reply brief, to and including **June 22, 2021**.

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1 This is the first request for an extension to respond to Amex's Motion to Stay and this
2 request is made in good faith and not for the purpose of delay.

3 Dated: May 31, 2021

4 **LAW OFFICE OF**
5 **KEVIN L. HERNANDEZ**

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Dated: May 31, 2021

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National Bank**

IT IS SO ORDERED:


United States Magistrate Judge

DATED: June 1, 2021